

EXHIBIT D

A Vast Web of Vengeance

Outrageous lies destroyed Guy Babcock's online reputation. When he went hunting for their source, what he discovered was worse than he could have imagined.



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Published Jan. 30, 2021 Updated Feb. 2, 2021

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Guy Babcock vividly remembers the chilly Saturday evening when he discovered the stain on his family. It was September 2018. He, his wife and their young son had just returned to their home in Beckley, an English village outside of Oxford. Mr. Babcock still had his coat on when he got a frantic call from his father.

"I don't want to upset you, but there is some bad stuff on the internet," Mr. Babcock recalled his father saying. Someone, somewhere, had written terrible things online about Guy Babcock and his brother, and members of their 86-year-old father's social club had alerted him.

Mr. Babcock, a software engineer, got off the phone and Googled himself. The results were full of posts on strange sites accusing him of being a thief, a fraudster and a pedophile. The posts listed Mr. Babcock's contact details and employer.

The images were the worst: photos taken from his LinkedIn and Facebook pages that had "pedophile" written across them in red type. Someone had posted the doctored images on Pinterest, and Google's algorithms apparently liked things from Pinterest, and so the pictures were positioned at the very top of the Google results for "Guy Babcock."

Mr. Babcock, 59, was not a thief, a fraudster or a pedophile. "I remember being in complete shock," he said. "Why would someone do this? Who could it possibly be? Who would be so angry?"

Then he Googled his brother's name. The results were just as bad.

He tried his wife.

His sister.

His brother-in-law.

His teenage nephew.

His cousin.

His aunt.

They had all been hit. The men were branded as child molesters and pedophiles, the women as thieves and scammers. Only his 8-year-old son had been spared.

Guy Babcock was about to discover the power of a lone person to destroy countless reputations, aided by platforms like Google that rarely intervene. He was shocked when he discovered the identity of the assailant, the number of other victims and the duration of the digital violence.

Uncensored Vengeance

Public smears have been around for centuries. But they are far more effective in the internet age, gliding across platforms that are loath to crack down, said Peter W. Singer, co-author of "LikeWar: The Weaponization of Social Media."

The solution, he said, was to identify "super-spreaders" of slander, the people and the websites that wage the most vicious false attacks.

"The way to make the internet a less toxic place is setting limits on super-spreaders or even knocking them offline," Mr. Singer said. "Instead of policing everyone, we should police those who affect the most people."

The Babcock family had been targeted by a super-spreader, dragged into an internet cesspool where people's reputations are held for ransom.

Mr. Babcock was sure there was a way to have lies about him wiped from the internet. Many of the slanderous posts appeared on a website called Ripoff Report, which describes itself as a forum for exposing "complaints, reviews, scams, lawsuits, frauds." (Its tagline: "consumers educating consumers.")

He started clicking around and eventually found a part of the site where Ripoff Report offered “arbitration services,” which cost up to \$2,000, to get rid of “substantially false” information. That sounded like extortion; Mr. Babcock wasn’t about to pay to have lies removed.

Ripoff Report is one of hundreds of “complaint sites” — others include She’s a Homewrecker, Cheaterbot and Deadbeats Exposed — that let people anonymously expose an unreliable handyman, a cheating ex, a sexual predator.

But there is no fact-checking. The sites often charge money to take down posts, even defamatory ones. And there is limited accountability. Ripoff Report, like the others, notes on its site that, thanks to Section 230 of the federal Communications Decency Act, it isn’t responsible for what its users post.

If someone posts false information about you on the Ripoff Report, the CDA prohibits you from holding us liable for the statements which others have written. You can always sue the author if you want, but you can’t sue Ripoff Report just because we provide a forum for speech.

With that impunity, Ripoff Report and its ilk are willing to host pure, uncensored vengeance.

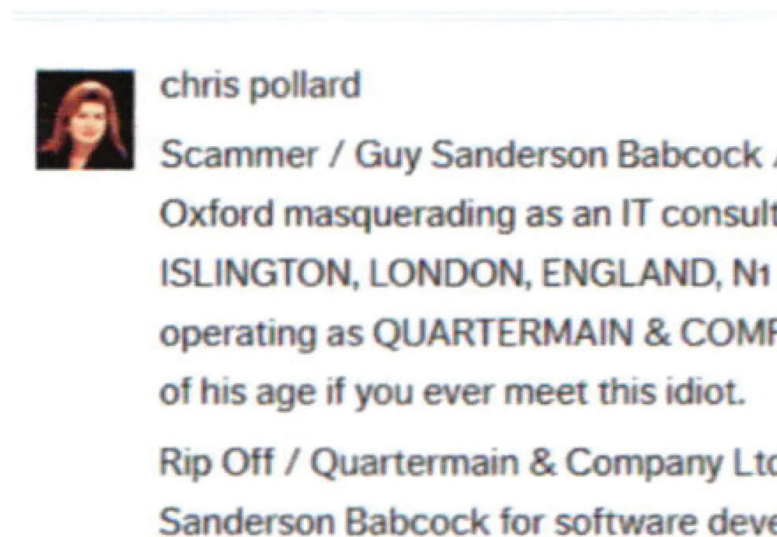
A Familiar Portrait

Google results are often the first impression a person makes. They help people decide whom to date, to hire, to rent a home to. Mr. Babcock worried that his family’s terrible Google search profiles could have serious repercussions, particularly for his 19-year-old nephew and his 27-year-old cousin, both just starting out in life.

Two weeks after Mr. Babcock discovered the pedophile posts, a friend called: He’d heard about the accusations from another village resident. Someone had spotted them while Googling an ice-cream parlor the Babcock family owned. Mr. Babcock soon installed a home security system; he’d read about vigilantes going after accused child molesters.

He and members of his extended family reported the online harassment to police in England and Canada, where most of them lived. Only the British authorities appeared to take the report seriously; a 1988 law prohibits communications that intentionally cause distress. An officer with the local Thames Valley police told Mr. Babcock to gather the evidence, so he and his brother-in-law, Luc Groleau, who lives outside of Montreal, started cataloging the posts in a Google document. It grew to more than 100 pages.

In October 2018, while scrolling through items deep in his Google results, Mr. Babcock came across a blog where a commenter falsely called him “a former janitor” who was “masquerading as an IT consultant.” It was similar to attacks elsewhere, but this one had an author photo attached: a woman with long, reddish hair, wearing a black blazer and chunky earrings.



Mr. Babcock discovered Nadire Atas's involvement when he found an old photo of her accompanying a slanderous comment on a blog post. The New York Times

Mr. Babcock stared at the photo in shock. He hadn’t seen it in decades, but he recognized it instantly. The woman’s name was Nadire Atas; this was her official work portrait from 1990, when she worked in a Re/Max real estate office the Babcock family owned outside Toronto. She had initially been a star employee, but her performance deteriorated, and in 1993 Mr. Babcock’s father had fired her. Afterward, she had threatened his father, according to an affidavit filed in a Canadian court.

Mr. Babcock felt lightheaded. A memory came back to him: When his mother died in 1999, the family had received vulgar, anonymous letters celebrating her death. A neighbor received a typed letter stating that Mr. Babcock’s father “has been seen roaming the neighbourhood late at night and masturbating behind the bushes.” The Babcocks had suspected Ms. Atas, who was the only person who

had ever threatened them. (Ms. Atas denied making threats or writing the letters.)

Decades later, it appeared that she was still harboring her grudge — and had updated her methods for the digital age.

A Trail of Clues



A lawyer, Christina Wallis, wrote about becoming a target of online harassment by Ms. Atas. The New York Times

Mr. Babcock searched Ms. Atas's name online and found a blog written by a Canadian lawyer, Christina Wallis. It was the first in a trail of clues that would eventually reveal the breadth of Ms. Atas's online campaign.

"A lie can travel halfway around the world while the truth is putting on its shoes," wrote Ms. Wallis, borrowing a quote often attributed to Mark Twain. She described how Ms. Atas had waged an online campaign against her, her colleagues and her family, including branding them pedophiles.

Mr. Babcock got goose bumps.

His brother-in-law, Mr. Groleau, contacted Ms. Wallis. She had represented a bank that foreclosed on two properties Ms. Atas owned in the early 2000s. Dozens of people had come under online attack: employees of the bank, lawyers who represented the bank, lawyers who represented those lawyers, relatives of those people and on and on. The attacks seemed engineered to perform well in search engines, and they included the victims' names, addresses, contact information and employers. (Ms. Atas denies being the author of many of these posts.)

For years, Ms. Wallis and her colleagues had been pursuing lawsuits and contacting the sites and technology platforms that hosted the material. Nothing had worked. The smears remained public, and the consequences became real.

A relative of one lawyer said she spent months applying for jobs in 2019 without getting any offers. The woman, who asked not to be named because she feared Ms. Atas, said her bills piled up. She worried she might lose her home.

Then she decided to apply for jobs using her maiden name, under which she hadn't been attacked. She quickly lined up three interviews and two offers.

These situations — where one angry person targets a large group of perceived enemies — are not uncommon. Maanit Zemel, a lawyer who specializes in online defamation, represents a group of 53 people who have filed a lawsuit saying they were attacked online by Tanvir Farid after he failed to get jobs at their companies. (Mr. Farid's lawyer declined to comment.)

For victims, these sorts of attacks "can literally end their life and their career and everything," Ms. Zemel said.

The victims in the Atas case live in Canada, Britain and the United States. In June 2020, Matthew Hefler, 32, the brother-in-law of a colleague of Ms. Wallis, became one of the latest targets. Mr. Hefler, who lives in Nova Scotia, is a historian who recently completed his Ph.D. in war studies. He is trying to find a teaching job. But anyone who searches for him online will encounter posts and images tarring him as a pedophile and "pervert freak."

Until recently, Mr. Hefler had never heard of Ms. Atas. He had no clue why she was attacking him. "You discover that someone you've never met, across the country, is running a one-man troll farm against you," Mr. Hefler said. "It's a nightmare scenario."

The Gunshot



Ms. Atas in 2019, outside the courthouse in Toronto. The New York Times

In October 2018, Mr. Babcock and his family sued Ms. Atas for defamation in a Toronto court, detailing hundreds of posts falsely accusing them of pedophilia and other lurid acts.

Ms. Atas claims that she didn't write those posts and that her enemies fabricated the case against her. But the evidence suggests otherwise. For example, most of the attacks were posted anonymously, but like Mr. Babcock, I discovered a "paedophile" accusation against him on an old WordPress blog where she was listed as the author. When I asked her about it, Ms. Atas denied writing it. A few days later, the years-old comment had been deleted.

During multiple interviews in recent months, Ms. Atas refused to divulge much about herself. She told me she was worried about the impact of a New York Times article. "Anyone who Googles my name, this will come up, and I don't want this to come up," she said.

But a portrait emerges from legal filings and evidence submitted in court cases, newspaper articles and people who have known her over the years.

Ms. Atas, 60, grew up near Toronto. By the 90s, she had become a successful real estate agent. A colleague in the Babcocks' Re/Max office described her as "a producer" who thrived in what was then a male-dominated field.

In 1991, she had done well enough that she was able to buy a duplex. She later bought a building in Toronto, with four apartments that she rented out.

But her life was beginning to fall apart. In October 1992, her brother, then 23, called the police saying that their mother "was involved in a devil-worshipping cult," according to an article in a local newspaper, The Spectator. Days later, Ms. Atas's brother shot his mother in the hand. (A judge ruled that Ms. Atas's brother was not guilty by reason of insanity, The Spectator reported. I couldn't reach him for comment.)

"Obviously, it would take a toll on anyone," Ms. Atas told me.

A few months after the shooting, the Babcocks fired Ms. Atas. She told me she chose to leave on her own.

A Waterfall of Maggots

Ms. Atas vanished from the public record for the next nine years. But around 2001, according to Ontario court filings, she was arrested and charged with assault and resisting arrest. The charges were ultimately withdrawn, but a peace bond, Canada's equivalent of a restraining order, was issued against her.

Ms. Atas moved into one of the apartments in her Toronto building, which was the subject of complaints from tenants. One, who moved in during 2008, found their new apartment filthy. When they opened the refrigerator, the tenant said in an interview, a "waterfall of maggots" poured out.

Ms. Atas made the building's residents feel unsafe. "She has harassed us repeatedly, forcing us to finally call the police on her," according to an email from a tenant that was filed in court. Ms. Atas was charged with assaulting another tenant. She said in a court filing that at the time she "was suffering from severe mental illness that manifested itself in erratic behaviour that resulted in criminal charges." The charges were ultimately dropped.

Ms. Atas stopped making mortgage payments on the building. In March 2008, her lender, Peoples Trust, represented by Ms. Wallis, began proceedings to repossess the property. She was evicted the next year.

Ms. Atas allegedly resorted to revenge. In 2009, Matt Cameron, a junior lawyer working with Ms. Wallis on the Atas case, started getting calls and emails at the office from men interested in meeting for sex. Someone impersonating him had responded by email to raunchy Craigslist ads and given his contact information. (Metadata from those emails, filed in court, pointed to Ms. Atas's involvement.)

A relative of Ms. Atas told me that family members had repeatedly tried and failed to get her help for mental health problems. "I have periodically suffered from depression," Ms. Atas wrote to me in an email. "I have had treatment. I am healthy and fine."

I described Ms. Atas to Todd Essig, a psychologist who writes about technology and mental health. He said someone like Ms. Atas could be forced into mental health treatment if she posed a physical danger. "But when someone is a threat to themselves or others online, there's no way for the mental health system to legally intervene," he said.

"I also see her as a victim here," Dr. Essig added. "Tech companies have given her the power to do something that has really taken apart her life."

'I'm Frantic'

Many lawsuits sprang from the wreckage of Ms. Atas's homeownership. This is the only part of her life that she wanted to talk about with me: her legal cases, which are numerous. She sued the lawyers who opposed her, and she sued those who represented her, and she sued those who represented those lawyers.

And then, around 2015, she came across a new weapon. She started attacking her perceived enemies online on the Ripoff Report and elsewhere. She called Ms. Wallis and her colleagues "incompetent," "fraudsters" and "jackasses." (Ms. Atas acknowledged she was behind these posts.) Someone created multiple WordPress blogs to attack the lawyers.

Ms. Wallis had no doubt it was Ms. Atas. "She blames me clearly that I have cost her her livelihood and that I made everything in her life go wrong," Ms. Wallis said. "I would like her to be banned from the internet for life. She doesn't know how to use the internet without abusing everyone."

Ms. Wallis, other lawyers and Peoples Trust employees filed a defamation lawsuit against Ms. Atas in 2016. The judge told Ms. Atas to stop posting about the lawyers. So she began writing about their family members. That was also when the attacks on the Babcocks began.



Gary M. Caplan, a lawyer in Toronto, represents dozens of people who have sued Ms. Atas for defamation. The New York Times

Gary M. Caplan is the lawyer for Ms. Wallis, Mr. Babcock and 43 others who have sued Ms. Atas for defamation. One of those plaintiffs is Mr. Caplan's brother, who came under attack after Mr. Caplan got involved in the case. There are another 100 or so people who have been targeted but aren't plaintiffs. Over the last two years, there have been more than 12,000 defamatory posts, according to software that Mr. Babcock's brother-in-law created to track new posts.

Many of the victims have tried to get tech companies to remove the abusive posts. Mr. Caplan said they have run headlong into American laws that protect American websites.

There is Section 230 of the Communications Decency Act. It says that publishing platforms aren't liable for what their users publish, even if they moderate some content. (Section 230 has become a touchstone in politicians' fight against Big Tech. Conservatives argue it enables companies like Facebook and Twitter to censor them. Liberals argue it allows the companies to host harmful content with impunity.) And under U.S. law, a foreign court generally can't force an American website to remove content.

The only site the victims had success with was Ripoff Report. It took a year of emails from their lawyer, but in December 2016, the site took down 14 posts.

"Ripoff Report believes in the First Amendment but is also cognizant of the fact that people can, and do, abuse online platforms, including ours," said Anette Beebe, Ripoff Report's general counsel. "As resources allow, we certainly do try to address it if/when it comes to our attention."

The next month, Ms. Atas began calling Ed Magedson, Ripoff Report's founder, who routinely records his calls.

"I'm frantic right now. I had posted reports," Ms. Atas said in the first call. "I just discovered that your company has removed some of the postings." Ripoff Report provided the victims' lawyers with the recordings — proof that she was behind the abuse.

Aside from Ripoff Report, there were thousands of posts on more than 100 other "complaint sites." Most of those sites don't reveal who runs them and don't respond to emails. Those posts remain online.

Trailing Ms. Atas

In Toronto, the court battle in the defamation cases continued. In 2017, Judge David Corbett deemed Ms. Atas a vexatious litigant who was “ungovernable and bent on a campaign of abuse and harassment,” citing her digital assaults on lawyers. That meant Ms. Atas could no longer file lawsuits without the court’s permission. At that point, her victims said, the attacks began increasing.

The next year, Mr. Caplan hired a private investigator to trail Ms. Atas, because she refused to say where she lived or how she accessed the internet. Mr. Caplan wanted that information in order to obtain evidence for his lawsuit.

One evening in June 2018, the investigator followed Ms. Atas as she left court, got on a subway and then boarded a bus.

At 7:30 p.m., Ms. Atas entered a public library at the University of Toronto. She spent the next few hours at a computer, according to the investigator’s written report and photos that he took surreptitiously. Then she rode a bus to a homeless shelter. (Ms. Atas denied that she stayed in the shelter.)



Images of Ms. Atas from the report by a private investigator hired by the lawyer of her victims. The New York Times

In response to subpoenas, Pinterest, Facebook and WordPress, the blogging site, had provided Mr. Caplan with metadata about the abusive posts. Some had originated from computers at the University of Toronto. Suddenly, that made sense.

Early last year, Judge Corbett found Ms. Atas in contempt of court because she had written to another judge, violating the restrictions placed on her as a vexatious litigant. She was sentenced to 74 days in prison. While she was locked up, the online attacks slowed to a trickle. (The fact that they didn’t cease altogether might have been because some complaint sites take content from one another, a pattern of mimicry that can keep attacks flowing.) When she was released in March, they resumed. Ms. Atas told me it wasn’t her.

During an interview with Ms. Atas in November, she grew angry that I planned to write this article. A week later, someone started writing posts about me and my husband on Cheaterbot, BadGirlReports and some of the other sites where Mr. Babcock and others had been targeted. The posts claimed that my husband was a drug addict and that I was a plagiarist who slept with my boss in order to get promoted. Ms. Atas said it wasn’t her.

Within a week, there were more than 100 posts about me.

After Ms. Atas talked to my editor, posts appeared about her. Ms. Atas said she hadn’t created those, either.

In an email, she warned me, “Any story in the New York Times will obviously bring out the trolls on the internet and could multiply the internet postings.”

‘Unlawful Acts of Reprisal’

On Thursday, Judge Corbett issued a ruling in the defamation suits, finding that Ms. Atas was responsible for what he called “unlawful acts of reprisal.” Ms. Atas, he wrote, is “apparently content to revel in ancient grievances, delighting in legal process and unending conflict because of the misery and expense it causes for her opponents.” He ordered Ms. Atas to stop.

But the judge left it up to the plaintiffs to try to get her slanderous posts taken down, even as he decried the free-for-all nature of online activity. “A situation that allows someone like Atas to carry on as she has, effectively unchecked for years, shows a lack of effective regulation that imperils order and the marketplace of ideas,” he wrote.

For the last decade or so, cases like this have been written off as just what happens in the internet era. If you crossed paths with someone who tried to destroy you online, for whatever reason, you were deemed collateral damage of our modern age. People were told, basically, to shrug it off.

Until recently, Google would remove a website from your results only if it could cause financial damage, such as by exposing your Social Security number. Now Google will remove other harmful content, including revenge porn and private medical information. At the end of 2019, it introduced a new category of information it will take out of your results: “sites with exploitative removal practices.” Google also started down-ranking some of the “complaint” sites, including Ripoff Report.

For someone like me, with lots of pre-existing Google results, posts on sites like BadGirlReports barely show up. But for people with less of an online presence, like Mr. Babcock, the sites still dominate search results.

Ms. Atas’s victims spent years begging Google, Pinterest and WordPress to take down the slanderous posts or at least make them harder to find. The companies rarely did so, until I contacted them to request comment for this article. Pinterest then removed photos linked to Ms. Atas. Automattic, which owns WordPress, deleted her blogs.

Yet even that hasn’t solved the problem. See for yourself: Do a Google search for “Guy Babcock.”